

JP:KLK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15M 1068

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT
COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960))

SHUREEN GIDDINGS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

THOMAS WILBERT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about November 9, 2015, within the Eastern District of New York and elsewhere, the defendant SHUREEN GIDDINGS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:¹

1. On or about November 9, 2015, the defendant SHUREEN GIDDINGS arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Overland Airways flight 272 from Guyana.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

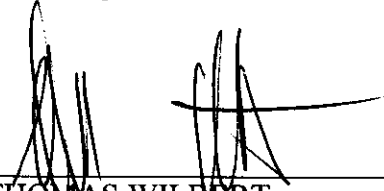
2. The defendant SHUREEN GIDDINGS was selected for a Customs and Border Protection ("CBP") examination. The CBP officer conducted a baggage exam with negative results. During the examination, the defendant appeared nervous. The defendant stated that she paid cash for her ticket and that this was her third trip to the United States. A CBP officer then conducted a pat-down search with negative results. During further questioning, GIDDINGS admitted that she had ingested pellets. She stated that she could no longer hold them and requested use of the restroom. Approximately 17 pellets were retrieved at that time.

3. SHUREEN GIDDINGS was escorted to a medical facility at JFK airport for an X-ray examination. The X-ray examination detected foreign bodies in the defendant's stomach.

4. One of the pellets that the defendant passed was probed and field-tested positive for the presence of cocaine.

5. The defendant SHUREEN GIDDINGS will be detained at JFK medical facility until such time as she has passed all the pellets contained in her intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant SHUREEN GIDDINGS be dealt with according to law.



THOMAS WILBERT
Special Agent
Homeland Security Investigations.

Sworn to before me on
10th day of November, 2015

THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK